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**UNITED STATES DISTRICT COURT**

**STATE OF NEVADA**

SHAHEEN W. AHMAD, an individual

Plaintiff,

vs.

UNIVERSITY MEDICAL CENTER OF  
SOUTHERN NEVADA, a political  
subdivision of Clark County, State of Nevada;  
Board of Trustee of Clark County

Defendants.

CASE NO: 2:15-cv-01001-GMN-NJK

**DEFENDANTS UNIVERSITY  
MEDICAL CENTER OF SOUTHERN  
NEVADA'S MOTION FOR RELIEF  
FROM EARLY NEUTRAL  
EVALUATION CONFERENCE  
ATTENDANCE REQUIREMENTS**

Defendants UNIVERSITY MEDICAL CENTER OF SOUTHERN NEVADA

(hereinafter "UMC"), hereby moves this Court for an Order Relieving UMC from the Early Neutral Evaluation (hereinafter "ENE") Conference attendance requirements. The ENE Conference is scheduled for October 6, 2015. This motion is brought pursuant to Magistrate Judge Peggy A. Leen's Order, Docket No. 11 and Local Rule 16-6.

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1 This Motion is based on the following memorandum of points and authorities, the papers  
2 and pleadings already on file with the Court, and any evidence presented at hearing, should one  
3 be allowed.

4 DATED this 6<sup>th</sup> day of August, 2015.

5 MORRIS, SULLIVAN, LEMKUL &  
6 PITEGOFF

7 */s/ Jeffrey Pitegoff*  
8 JEFFREY I. PITEGOFF, ESQ.  
9 Nevada Bar No. 005458  
10 3770 Howard Hughes Parkway, Suite 170  
Las Vegas, NV 89169  
*Attorney for Defendants*

11 **MEMORANDUM OF POINTS AND AUTHORITIES**

12 Defendant, UMC, hereby requests an exception to the ENE Conference attendance  
13 requirements. As the Court is aware, UMC is part of Clark County and a public entity. As such,  
14 all authority for settlements and ultimate resolution of matters must be approved by the County  
15 Commissioners. UMC intends to have Doug Spring appear as its representative. Mr. Spring is  
16 the Director of Human Resource Operations for UMC. He has appeared for ENE Conferences  
17 on behalf of UMC in the past, and will present any potential resolution for the County  
18 Commissioner's consideration. Consequently, Defendant respectfully requests relief from the  
19 attendance requirements.  
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21 **CONCLUSION**

22 Based on the foregoing reasons, Defendants', respectfully request an Order relieving  
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1 UMC from the ENE Conference attendance requirements, and to allow Doug Spring, to appear at  
2 the ENE Conference set for October 6, 2015 on behalf of Defendant, UMC.

3  
4 DATED this 6<sup>th</sup> day of August, 2015.

5  
6 MORRIS, SULLIVAN, LEMKUL &  
7 PITEGOFF

8 /s/ Jeffrey Pitegoff

9 JEFFREY I. PITEGOFF, ESQ.  
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11 3770 Howard Hughes Parkway, Suite 170  
12 Las Vegas, NV 89169  
13 *Attorney for Defendants*

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15 IT IS SO ORDERED this 10th day  
16 of August, 2015.

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18 Peggy A. Leen  
19 United States Magistrate